REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for courtesies extended during the Examiner Interview of April 20, 2005.

Disposition of Claims

Claims 1, 3-11, 13-18, and 20 are currently pending in this application. Claim 7 has been canceled by this reply. Claims 1, 11, 18, and 20 are independent. The remaining claims depend, directly or indirectly, from claims 1, 11, and 18.

Drawings

Applicant respectfully requests the Examiner to accept the drawings filed on January 19, 2001, and corrected on September 24, 2004.

Rejections under 35 U.S.C. § 101

Claims 1, 3-11, and 13-17 stand rejected under 35 U.S.C. 101 because the claimed invention is directed toward non-statutory subject matter. Claim 7 has been canceled by this reply. Thus, this rejection is moot with respect to claim 7. Claims 1 and 11 have been amended to clarify the present invention as recited. To the extent that this rejection may still apply to the remaining amended claims, this rejection is respectfully traversed.

As agreed upon during the Examiner Interview conducted April 20, 2005, claim 1 has been amended to recite a hardware device (*i.e.*, a processor) that implements the module including development tools to easily generate JES bundles and an IDE that is used to execute the module with the development tools for the generation of JES bundles. The JES bundles generated by the invention may be subsequently used by a JES. Thus, the amended claims now clearly recite interaction between different elements to produce a result useful in the arts (*i.e.*, JES bundles), which previous to the present invention, where difficult to generate. Further, independent claim 11 has also been amended to recite a computer system that implements the module including the development tools, and the IDE. Thus, independent claims 1 and 11 are

patentable under 35 U.S.C. 101. Dependent claims 3-10 and 13-17 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Rejection(s) under 35 U.S.C § 112

Claim 1 stands rejected under 35 U.S.C. 112, second paragraph, as being indefinite. To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed. The Examiner asserts that the limitation "module is adapted for" does not define whether an action is actually taking place. Claim 1 has been amended and no longer includes this phrase. Specifically, claim 1 has been amended to recite that the module is executed within an IDE. Accordingly, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 1, 3-11, 13-18, and 20 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,633,888 ("Kobayashi") in view of Admitted Prior Art submitted in the Affidavit 1.132 filed September 24, 2004 and Anne Thomas' White Paper ("APA"). Claim 7 has been canceled by this reply. Thus, this rejection is now moot with respect to claim 7. The independent claims of the present invention have been amended to include additional limitations. To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

The claimed invention is directed toward a method of creating Java Embedded Server (JES) bundles using development tools provided within a module that is executed in an Integrated Development Environment (IDE) (see, *e.g.*, Figure 7 and accompanying text on page 6-7 of the specification). One of the development tools used to create JES bundles is a Java Embedded Server Manifest Generator (shown in Figure 10). The Manifest Generator is used to create and edit manifest files which are subsequently used to create a JES bundle.

With respect to the rejection of the claims, claim 1 has been amended to recite that the module is used to "generate JES bundles using a plurality of development tools, wherein the plurality of development tools comprise a JES manifest generator tool configured to create JES manifest files for JES bundles." Further, claim 1 has been amended to recite that the module itself executes in an IDE. Thus, is an essential feature of the claimed invention that the module

and the development tools used to generate the JES bundles are executed within an IDE because the IDE enables the manifest generator tool to save development time by providing the name of each JES manifest header along with the description, the syntax, and an example of the use of the manifest headers (*See* Specification, page 8, lines 7-9). Because the generation of JES bundles is very time consuming and difficult, the present invention attempts to simplify the process by executing the module and the manifest generator tool within an IDE.

Applicant is not claimed only a manifest generator tool. Instead, Applicant is claiming a manifest generator tool *in an IDE*. Further, in the amended claims, Applicant is claiming a manifest generator tool configured to create JES manifest files for JES bundles. Applicant respectfully asserts that neither Kobayashi nor APA disclose a manifest generator tool *in an IDE* for the generation of JES bundles. During the Examiner interview of April 20, 2005, the Examiner referred to APA (*i.e.,* Anne Thomas' White Paper) as providing information that renders JES bundles obvious (*See* APA, page 6). However, the cited portion of APA fails to disclose a manifest generator tool. Rather, APA simple discloses that an application service bundle *includes* a manifest. Further, APA is completely silent regarding a manifest generator tool executing *in an ID*. One skilled in the art would not find including a manifest generator tool in an IDE to be obvious, because the concept of creating JES bundles using an IDE is not trivial, as evidenced by the complex graphical user interface used to create the JES bundles (*See* Specification, Figures 8-12 and pages 6-10). In fact, the IDE in the present invention provides an advantage that allows the manifest generator tool to execute in a manner that makes the generation of JES bundles easy and less time consuming.

Further, Kobayashi fails to disclose a manifest generator tool executing in an IDE. Rather, the IDE disclosed in Kobayashi is part of a visual environment add-on (VEA) and uses a Java bean compiler to produce beans (*i.e.,* beans contained in JAR files) that are used by the visual builder. The IDE of Kobayashi is not used to generate any type of bundles using a manifest generator tool that allows the generation of JES bundles easily by providing the header information for each manifest file, as recited in the claims of the present invention. In fact, Kobayashi does not even disclose a manifest generator tool in relation to an IDE, nor does Kobayashi disclose an IDE in relation to JES bundles.
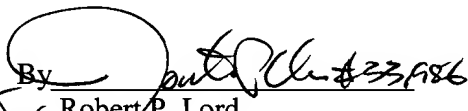
In view of the above, it is clear that neither Kobayashi nor APA, whether considered separately or in combination, render the claimed invention obvious. Thus, amended independent claim 1 is patentable over Kobayashi and APA. Further, independent claims 11, 18, and 20 have been amended to include similar allowable subject matter and are patentable over Kobayashi and APA for at least the same reasons as claim 1. Dependent claims 3-6, 8-10, and 13-17 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.
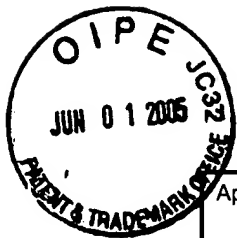
Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 14695/007001).

Dated: June 1, 2005   Respectfully submitted,

                                                       By

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